

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL NO. 2272
LITIGATION)	
)	
This Document Relates to All Cases)	Master Docket Case No. 1:11-cv-05468
)	
)	Honorable Rebecca Pallmeyer

**JOINT PROPOSED AGENDA FOR
NOVEMBER 10, 2011, STATUS CONFERENCE**

The parties jointly submit the following agenda for this Court's the November 10,
2011 Status Conference:

1. Case Management Order No. 1
2. Initial disclosures
3. Motion For Leave To File Position Statements And Schedule Position Presentations
4. Protective Order
5. Master complaint/answer process
6. Discovery
 - a. Motion For Approval Of Authorization And Entry Of Schedule On
Authorizations And Fact Sheets
 - b. Plaintiffs' Interrogatories and Requests For Production
 - c. Schedule for discovery
 - d. ESI protocols
7. Preservation of documents
8. Improperly venued cases

Respectfully submitted,

Dated: November 7, 2011

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Surgical, Inc., and Zimmer US, Inc.*

CERTIFICATE OF SERVICE

I certify that on November 7, 2011, a copy of the foregoing Joint Proposed Agenda For November 10, 2011, Status Conference was filed electronically. Parties may access this filing through the Court's system. I further certify that on November 7, 2011, a copy of the foregoing Joint Proposed Agenda For November 10, 2011, Status Conference was sent by first-class United States mail, postage prepaid, upon the following:

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